

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

NICO BURRELL, : **SEALED**

a/k/a "Zico Nico," : **SUPERSEDING**

DOUGLAS MCLARTY, : **INDICTMENT**

a/k/a "Q-Don," : S2 15 Cr. 95 (AJN)

a/k/a "Q-Dizzy," :

MARTIN MITCHELL, :

a/k/a "Tyliciek," :

DONQUE TYRELL, :

a/k/a "Polo Rell," :

GERARD BASS, :

a/k/a "Roddo," :

DOMINICK SHERLAND, :

a/k/a "D-Nick," :

BARFFOUR ABEBERSE, :

a/k/a "BB," :

a/k/a "Duce Bigga," :

MASHUD YODA, :

a/k/a "Papa Ola," :

ANDERSON ROSS, :

a/k/a "Boogy," :

a/k/a "Boogy Boo," :

a/k/a "Ray Allen Jr.," :

ANTHONY KING, :

a/k/a "Ant-Dog," :

MARK WILLIAMS, :

a/k/a "Spangler," :

a/k/a "Markie Bossin," :

QUAYSEAN CANNONIER, :

a/k/a "Tic-Tic," :

TAYQUAN TUCKER, :

a/k/a "Chicken," :

a/k/a "Chickenita," :

WILLIAM REID, :

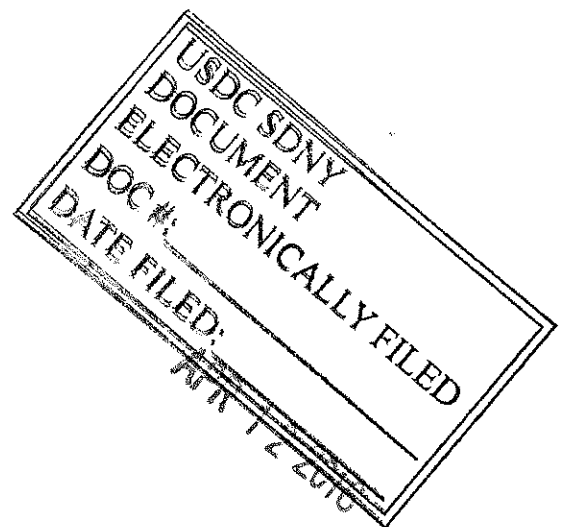
a/k/a "Uptown Will," :

MARLON ROBERTS, :

a/k/a "Fetti," :

ABDULLAH YODA, :

a/k/a "Dellah," :



KENNETH RUGGS,
 a/k/a "Money Making Kenny," :
 CALVIN RUGGS,
 a/k/a "GQ," :
 FABIAN MORRISON,
 a/k/a "Fabo," :
 SHAQUILLE DEWAR,
 a/k/a "Shaq Doe," :
 DESEAN BENNETT,
 a/k/a "Doola," :
 JAFAR BORDEN,
 a/k/a "Jaffy," :
 JOSE RODRIGUEZ,
 a/k/a "Hov," :
 SHAVON WRIGHT,
 a/k/a "Bhippy," :
 a/k/a "Yung Bhippy," :
 RASHEID BUTLER,
 a/k/a "Rah," :
 BRIAN RICHARDS,
 a/k/a "B-Rich," :
 DEVANTE JOSEPH,
 a/k/a "Wiz," :
 STEPHAN CLARKE,
 : :
 JAMES PILGRIM,
 a/k/a "Jizzle," :
 MICHELLE JEMISON,
 a/k/a "Pebbles," :
 IVANJOEL ARYEETAY,
 a/k/a "Ijoe," :
 a/k/a "Ivan," :
 ROBERT HAUGHTON,
 : :
 a/k/a "Duke," :
 JAMAL BLAIR,
 : :
 a/k/a "Fish," :
 ONEIL DASILVA,
 : :
 a/k/a "Soxx," :
 a/k/a "Bobby Soxx," :
 DURELL GUY,
 HAKEEM CAMPBELL,
 : :
 a/k/a "Ocky," :
 a/k/a "Ackee," :
 RICHARD PHILLIPS,
 : :
 a/k/a "G-Mack," :
 RUSHAUN BROWN,
 : :
 a/k/a "Boobie," :
 a/k/a "Gambino," :

MICHAEL FRANCIS,	:
a/k/a "Mikey Bandz,"	:
TYRONE GRAY,	:
a/k/a "Ty,"	:
LAMAR FRANCIS,	:
a/k/a "Lammy,"	:
a/k/a "Andrew Blacks,"	:
SHANE BENNETT,	:
a/k/a "Fattah,"	:
DAVID JONES,	:
RICARDO STEWART,	:
a/k/a "Cardo,"	:
DANTE PLUMMER,	:
a/k/a "Tae,"	:
JOEL HARGROVE,	:
a/k/a "Flow,"	:
SHAWN REID,	:
a/k/a "Sama,"	:
a/k/a "Sama Lama,"	:
BRADLEY WILSON,	:
a/k/a "Broadway,"	:
ROBERT FELICIANO,	:
a/k/a "RJ,"	:
DANTE STEPHENS,	:
a/k/a "Jibba,"	:
CARLETTO ALLEN,	:
a/k/a "Joker,"	:
SHAQUILLE JOHN,	:
a/k/a "Poppy,"	:
OKEIFA JOHN,	:
a/k/a "Ratty,"	:
DAQUAN REID,	:
a/k/a "DQ,"	:
MICHAEL REDLEY,	:
a/k/a "Mikey,"	:
a/k/a "Jones,"	:
ALBERT AMPONSAH,	:
a/k/a "Jungle,"	:
RICHARD MONTAGUE,	:
a/k/a "Spanks,"	:
ANTHONY LETTERIO,	:
a/k/a "Yay,"	:
RAI THOMAS,	:
a/k/a "Ritch,"	:

JAVONE PEARCE, :
a/k/a "Jevy," :
SHANICE JOHN, :
DOMINIQUE BASS, :
a/k/a "Domo," and :
RICARDO BURGESS, :
a/k/a "Zilla," :

Defendants. :

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COUNT ONE

RACKETEERING CONSPIRACY

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tylik," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS, a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY KING, a/k/a "Ant-Dog," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," QUAYSEAN CANNONIER, a/k/a "Tic-Tic," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS, a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS, a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JAFAR

BORDEN, a/k/a "Jaffy," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," RASHEID BUTLER, a/k/a "Rah," BRIAN RICHARDS, a/k/a "B-Rich," DEVANTE JOSEPH, a/k/a "Wiz," STEPHAN CLARKE, JAMES PILGRIM, a/k/a "Jizzle," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETAY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," DAVID JONES, RICARDO STEWART, a/k/a "Cardo," DANTE PLUMMER, a/k/a "Tae," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," and CARLETTO ALLEN, a/k/a "Joker," the defendants, and others known and unknown, were members and associates of the Big Money Bosses street gang ("BMB" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other things, murder, attempted murder, robbery, attempted robbery, narcotics trafficking, bank fraud, and the passing of counterfeit currency.

2. BMB was a faction of the "Young Bosses," or "YBz" street gang, which operates in various parts of New York City.

BMB, whose members and associates also referred to themselves as "Blamma," "Money Making Mafia," or "Triple M," operated principally in the vicinity of White Plains Road between 215th Street and 233rd Street in the Bronx, New York, including in an area on 224th Street described by members of the Enterprise as the "Forts," as well as in the vicinity of Boston Road and Eastchester Road in the Bronx, in an area described by members of the Enterprise as "B-Road."

3. Members of BMB and their associates committed acts of violence, including shootings, against rival gangs, including: (a) the "2Fly YGz," which is based in the Eastchester Gardens public housing development in the Bronx ("2Fly"); (b) the "Slut Gang," which is based in the Boston Secor public housing development in the Bronx; and (c) the "YSGz," which is based in the Edenwald public housing development in the Bronx.

4. Among the murders and other acts of violence committed in the Bronx, New York by members and associates of the Enterprise were: (a) the murder of Sadie Mitchell, who was killed in her own home by a stray bullet, at the age of 92, by an associate of BMB in the vicinity of White Plains Road and 224th Street and White Plains Road, on or about October 20, 2009; (b) the murder of Keshon Potterfield, a/k/a "Keke," who was shot to death, at the age of 18, by a member of BMB in the vicinity of 232nd Street between White Plains Road and Barnes Avenue, on

or about June 22, 2014; and (c) the murder of Jeffrey Delmore, a/k/a "Famous," a/k/a "Junior," who was stabbed to death, at the age of 15, by members of BMB in the vicinity of East Gun Hill Road, on or about May 15, 2015.

5. In addition to committing acts of violence and selling narcotics, members and associates of BMB engaged in robbery, attempted robbery, and bank fraud, and passed counterfeit currency, all in order to generate funds for the Enterprise.

6. NICO BURRELL, a/k/a "Zico Nico," and DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," were leaders of BMB authorized to order acts of violence and to recruit new members into the Enterprise. Leaders of BMB were called "Big Suits," and were further subcategorized as, among other things, "Burberry Suits," "Louis Suits," "Gucci Suits," "Ferragamo Suits," and "Sean John Suits," in order to signify their relative rank in the Enterprise.

7. BMB, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times

relevant to this Indictment, the Enterprise has engaged in, and its activities affected, interstate and foreign commerce.

8. NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tyliet," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS, a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY KING, a/k/a "Ant-Dog," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," QUAYSEAN CANNONIER, a/k/a "Tic-Tic," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS, a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS, a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JAFAR BORDEN, a/k/a "Jaffy," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," RASHEID BUTLER, a/k/a "Rah," BRIAN RICHARDS, a/k/a "B-Rich," DEVANTE JOSEPH, a/k/a "Wiz," STEPHAN CLARKE, JAMES PILGRIM, a/k/a "Jizzle," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETEEY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN,

a/k/a "Boobie," a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," DAVID JONES, RICARDO STEWART, a/k/a "Cardo," DANTE PLUMMER, a/k/a "Tae," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," and CARLETTO ALLEN, a/k/a "Joker," the defendants, were members and associates of the Enterprise who carried out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

PURPOSES OF THE ENTERPRISE

9. The purposes of the Enterprise included the following:
 - a. Enriching the members and associates of the Enterprise through, among other things, the distribution of narcotics, including marijuana and cocaine base, as well as robbery, attempted robbery, bank fraud, and the passage of counterfeit currency.
 - b. Preserving and protecting the power of the Enterprise and its members and associates through murder, attempted murder, other acts of violence, and threats of violence.

c. Promoting and enhancing the Enterprise and the activities of its members and associates.

MEANS AND METHODS OF THE ENTERPRISE

10. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the Enterprise committed, conspired to commit, and attempted to commit acts of violence, including murder, to protect and expand the Enterprise's criminal operations, and in connection with rivalries with members of other street gangs, such as 2Fly, the Slut Gang, and the YSGz.

b. Members and associates of the Enterprise used physical violence and threats of violence, including murder and attempted murder, against others, including in particular rival gang members and rival narcotics traffickers.

c. Members and associates of the Enterprise used physical violence against various people, including murders and attempted murders.

d. Members and associates of the Enterprise participated in robberies and attempted robberies.

e. Members and associates of the Enterprise sold narcotics, including marijuana and cocaine base.

f. Members and associates of the Enterprise engaged in bank fraud and passed counterfeit currency.

THE RACKETEERING VIOLATION

11. From at least in or about 2007, up to and including in or about 2016, in the Southern District of New York and elsewhere, NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tyliek," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS, a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY KING, a/k/a "Ant-Dog," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," QUAYSEAN CANNONIER, a/k/a "Tic-Tic," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS, a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS, a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JAFAR BORDEN, a/k/a "Jaffy," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," RASHEID BUTLER, a/k/a "Rah," BRIAN RICHARDS, a/k/a "B-Rich," DEVANTE JOSEPH, a/k/a "Wiz," STEPHAN CLARKE, JAMES PILGRIM, a/k/a "Jizzle," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETAY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a

"Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," DAVID JONES, RICARDO STEWART, a/k/a "Cardo," DANTE PLUMMER, a/k/a "Tae," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," and CARLETTO ALLEN, a/k/a "Joker," the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described in paragraphs 1 through 10 of Count One of this Indictment, to wit, BMB, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity consisting of:

Multiple acts involving murder, that is, New York Penal Law, Sections 20.00, 125.25, and 125.27 (murder); New York Penal Law, Sections 20.00, 110.00, and 125.25 (attempted murder); New York Penal Law, Sections 105.15 and 125.25 (conspiracy to murder);

Multiple acts involving robbery, that is, New York Penal Law, Sections 160.10, 160.05, 20.00 (robbery); New York Penal Law, Section 160.10, 160.05, 110.00 (attempted robbery); New York Penal Law 105.10 (conspiracy to commit robbery).

Multiple acts indictable under 18 U.S.C. § 1951 (Hobbs Act robbery).

Multiple acts involving the distribution of controlled substances, including 280 grams and more of cocaine base, marijuana, and oxycodone, in violation of the laws of the United States, specifically Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846, and Title 18, United States Code, Section 2.

Multiple acts indictable under 18 U.S.C. §§ 1344 and 2 (bank fraud); and

Multiple acts indictable under 18 U.S.C. §§ 472, 473, and 2 (the passage of counterfeit currency).

It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the Enterprise.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO

NARCOTICS CONSPIRACY

The Grand Jury further charges:

12. From at least in or about 2007, up to and including in or about 2016, in the Southern District of New York and elsewhere, NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tyliiek,"

DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS, a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY KING, a/k/a "Ant-Dog," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS, a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS, a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," RASHEID BUTLER, a/k/a "Rah," BRIAN RICHARDS, a/k/a "B-Rich," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETEEY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," RICARDO STEWART, a/k/a "Cardo," DANTE PLUMMER, a/k/a "Tae," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a

"RJ," DANTE STEPHENS, a/k/a "Jibba," CARLETTO ALLEN, a/k/a "Joker," SHAQUILLE JOHN, a/k/a "Poppy," OKEIFA JOHN, a/k/a "Ratty," DAQUAN REID, a/k/a "DQ," MICHAEL REDLEY, a/k/a "Mikey," a/k/a "Jones," ALBERT AMPONSAH, a/k/a "Jungle," RICHARD MONTAGUE, a/k/a "Spanks," ANTHONY LETTERIO, a/k/a "Yay," RAI THOMAS, a/k/a "Ritch," JAVONE PEARCE, a/k/a "Jevy," SHANICE JOHN, DOMINIQUE BASS, a/k/a "Domo," and RICARDO BURGESS, a/k/a "Zilla," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

13. It was a part and an object of the conspiracy that NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tylied," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS, a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY KING, a/k/a "Ant-Dog," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS, a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS, a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe,"

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 BUTLER, a/k/a "Rah," BRIAN RICHARDS, a/k/a "B-Rich," MICHELLE
 JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETAY, a/k/a "Ijoe," a/k/a
 "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a
 "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL
 GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD
 PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a
 "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY,
 a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks,"
 SHANE BENNETT, a/k/a "Fattah," RICARDO STEWART, a/k/a "Cardo,"
 DANTE PLUMMER, a/k/a "Tae," JOEL HARGROVE, a/k/a "Flow," SHAWN
 REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a
 "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a
 "Jibba," CARLETTA ALLEN, a/k/a "Joker," SHAQUILLE JOHN, a/k/a
 "Poppy," OKEIFA JOHN, a/k/a "Ratty," DAQUAN REID, a/k/a "DQ,"
 MICHAEL REDLEY, a/k/a "Mikey," a/k/a "Jones," ALBERT AMPONSAH,
 a/k/a "Jungle," RICHARD MONTAGUE, a/k/a "Spanks," ANTHONY
 LETTERIO, a/k/a "Yay," RAI THOMAS, a/k/a "Ritch," JAVONE PEARCE,
 a/k/a "Jevy," SHANICE JOHN, DOMINIQUE BASS, a/k/a "Domo," and
 RICARDO BURGESS, a/k/a "Zilla," the defendants, and others known
 and unknown, would and did distribute and possess with intent to
 distribute controlled substances, in violation of Title 21,
 United States Code, Section 841(a)(1).

14. The controlled substances that NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tyliek," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS, a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY KING, a/k/a "Ant-Dog," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS, a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS, a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," RASHEID BUTLER, a/k/a "Rah," BRIAN RICHARDS, a/k/a "B-Rich," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETAY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," RICARDO STEWART, a/k/a "Cardo," DANTE

PLUMMER, a/k/a "Tae," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," CARLETTO ALLEN, a/k/a "Joker," SHAQUILLE JOHN, a/k/a "Poppy," OKEIFA JOHN, a/k/a "Ratty," DAQUAN REID, a/k/a "DQ," MICHAEL REDLEY, a/k/a "Mikey," a/k/a "Jones," ALBERT AMPONSAH, a/k/a "Jungle," RICHARD MONTAGUE, a/k/a "Spanks," ANTHONY LETTERIO, a/k/a "Yay," RAI THOMAS, a/k/a "Ritch," JAVONE PEARCE, a/k/a "Jevy," SHANICE JOHN, DOMINIQUE BASS, a/k/a "Domo," and RICARDO BURGESS, a/k/a "Zilla," the defendants, conspired to distribute and possess with intent to distribute were: (1) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack" cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); (2) 100 kilograms and more of a quantity of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B); and (3) a quantity of mixtures and substances containing a detectable amount of oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT THREE

DISTRIBUTION OF NARCOTICS WITHIN ONE THOUSAND
FEET OF PLAYGROUNDS AND SCHOOLS

The Grand Jury further charges:

15. From at least in or about 2007, up to and including in or about 2016, in the Southern District of New York and elsewhere, DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," MARLON ROBERTS, a/k/a "Fetti," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETAY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," RICARDO STEWART, a/k/a "Cardo," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama

Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," CARLETTO ALLEN, a/k/a "Joker," SHAQUILLE JOHN, a/k/a "Poppy," OKEIFA JOHN, a/k/a "Ratty," DAQUAN REID, a/k/a "DQ," MICHAEL REDLEY, a/k/a "Mikey," a/k/a "Jones," ALBERT AMPONSAH, a/k/a "Jungle," RICHARD MONTAGUE, a/k/a "Spanks," JAVONE PEARCE, a/k/a "Jevy," SHANICE JOHN, DOMINIQUE BASS, a/k/a "Domo," and RICARDO BURGESS, a/k/a "Zilla," the defendants, intentionally and knowingly did distribute and possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

16. The controlled substances that DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," MARLON ROBERTS, a/k/a "Fetti," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETAY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie,"

a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," RICARDO STEWART, a/k/a "Cardo," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," CARLETTO ALLEN, a/k/a "Joker," SHAQUILLE JOHN, a/k/a "Poppy," OKEIFA JOHN, a/k/a "Ratty," DAQUAN REID, a/k/a "DQ," MICHAEL REDLEY, a/k/a "Mikey," a/k/a "Jones," ALBERT AMPONSAH, a/k/a "Jungle," RICHARD MONTAGUE, a/k/a "Spanks," JAVONE PEARCE, a/k/a "Jevy," SHANICE JOHN, DOMINIQUE BASS, a/k/a "Domo," and RICARDO BURGESS, a/k/a "Zilla," the defendants, distributed and possessed with intent to distribute were (1) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack" cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (2) 100 kilograms and more of a quantity of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B).

17. DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a

"Chickenita," MARLON ROBERTS, a/k/a "Fetti," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETHEY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," RICARDO STEWART, a/k/a "Cardo," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," CARLETTO ALLEN, a/k/a "Joker," SHAQUILLE JOHN, a/k/a "Poppy," OKEIFA JOHN, a/k/a "Ratty," DAQUAN REID, a/k/a "DQ," MICHAEL REDLEY, a/k/a "Mikey," a/k/a "Jones," ALBERT AMPONSAH, a/k/a "Jungle," RICHARD MONTAGUE, a/k/a "Spanks," JAVONE PEARCE, a/k/a "Jevy," SHANICE JOHN, DOMINIQUE BASS, a/k/a "Domo," and RICARDO BURGESS, a/k/a "Zilla," the defendants, knowingly committed the narcotics trafficking offense charged in Count Three of this Indictment within 1000 feet of: (1) playgrounds, to wit, the Agnes Haywood Playground located in the vicinity of Barnes Avenue between 215th

and 216th Streets, and the Rienzi Playground located in the vicinity of White Plains Road between 225th Street and 226th Street; and (2) public and private elementary, vocational, and secondary schools, to wit, Regent School located in the vicinity of White Plains Road and 216th Street, the Young Scholars Academy of the Bronx located in the vicinity of Barnes Avenue between 216th Street and 217th Street, the St. Mary School located in the vicinity of Carpenter Avenue between 224th Street and 225th Street, and P.S. 103 Hector Fontanez located in the vicinity of Carpenter Avenue between 229th Street and 230th Street, Bronx, New York.

(Title 21, United States Code, Sections 846 and 860, and Title 18, United States Code, Section 2.)

COUNT FOUR

USE OF FIREARMS IN FURTHERANCE OF COUNTS ONE AND TWO

The Grand Jury further charges:

18. From at least in or about 2007 up to and including in or about 2016, in the Southern District of New York and elsewhere, NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tyliet," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS, a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY KING, a/k/a "Ant-Dog," QUAYSEAN CANNONIER,

a/k/a "Tic-Tic," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS, a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS, a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JAFAR BORDEN, a/k/a "Jaffy," JOSE RODRIGUEZ, a/k/a "Hov," RASHEID BUTLER, a/k/a "Rah," BRIAN RICHARDS, a/k/a "B-Rich," DEVANTE JOSEPH, a/k/a "Wiz," STEPHAN CLARKE, JAMES PILGRIM, a/k/a "Jizzle," IVANJOEL ARYEETAY, a/k/a "Ijoe," a/k/a "Ivan," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RUSHAUN BROWN, a/k/a "Boobie," a/k/a "Gambino," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," DAVID JONES, RICARDO STEWART, a/k/a "Cardo," DANTE PLUMMER, a/k/a "Tae," ROBERT FELICIANO, a/k/a "RJ," CARLETTO ALLEN, a/k/a "Joker," OKEIFA JOHN, a/k/a "Ratty," and RICARDO BURGESS, a/k/a "Zilla," the defendants, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the racketeering conspiracy charged in Count One of this Indictment, and during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count Two of this

Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, including firearms that were discharged on multiple occasions.

(Title 18, United States Code,
Sections 924(c)(1)(A)(iii) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

19. As a result of committing the offense alleged in Count One of this Indictment, NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tyliel," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS, a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY KING, a/k/a "Ant-Dog," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," QUAYSEAN CANNONIER, a/k/a "Tic-Tic," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS, a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS, a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JAFAR BORDEN, a/k/a "Jaffy," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," RASHEID BUTLER, a/k/a "Rah,"

BRIAN RICHARDS, a/k/a "B-Rich," DEVANTE JOSEPH, a/k/a "Wiz," STEPHAN CLARKE, JAMES PILGRIM, a/k/a "Jizzle," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETAY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," DAVID JONES, RICARDO STEWART, a/k/a "Cardo," DANTE PLUMMER, a/k/a "Tae," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," and CARLETTA ALLEN, a/k/a "Joker," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, (i) any interest the defendants acquired or maintained as a result of the commission of the offense alleged in Count One of the Indictment; (ii) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendant has established, operated, controlled, conducted, or participated in the conduct of, in committing the offense alleged in Count One of the Indictment; and (iii) any property, constituting or derived

from, any proceeds which the defendants obtained, directly and indirectly, from the racketeering activity alleged in Count One of this Indictment.

Substitute Assets Provision

20. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1963;
Title 21, United States Code, Section 853(p); and
Title 28, United States Code, Section 2461(c).)

FORFEITURE ALLEGATION AS TO COUNT TWO

21. As a result of committing the controlled substance offense alleged in Count Two of this Indictment, NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don,"

a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tylied," DONQUE TYRELL,
 a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK
 SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a
 "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS,
 a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY
 KING, a/k/a "Ant-Dog," MARK WILLIAMS, a/k/a "Spangler," a/k/a
 "Markie Bossin," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a
 "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS,
 a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS,
 a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN
 MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe,"
 DESEAN BENNETT, a/k/a "Doola," JOSE RODRIGUEZ, a/k/a "Hov,"
 SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," RASHEID
 BUTLER, a/k/a "Rah," BRIAN RICHARDS, a/k/a "B-Rich," MICHELLE
 JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETEEY, a/k/a "Ijoe," a/k/a
 "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a
 "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL
 GUY, HAKEEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD
 PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a
 "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY,
 a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks,"
 SHANE BENNETT, a/k/a "Fattah," RICARDO STEWART, a/k/a "Cardo,"
 DANTE PLUMMER, a/k/a "Tae," JOEL HARGROVE, a/k/a "Flow," SHAWN
 REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a

"Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," CARLETTO ALLEN, a/k/a "Joker," SHAQUILLE JOHN, a/k/a "Poppy," OKEIFA JOHN, a/k/a "Ratty," DAQUAN REID, a/k/a "DQ," MICHAEL REDLEY, a/k/a "Mikey," a/k/a "Jones," ALBERT AMPONSAH, a/k/a "Jungle," RICHARD MONTAGUE, a/k/a "Spanks," ANTHONY LETTERIO, a/k/a "Yay," RAI THOMAS, a/k/a "Ritch," JAVONE PEARCE, a/k/a "Jevy," SHANICE JOHN, DOMINIQUE BASS, a/k/a "Domo," and RICARDO BURGESS, a/k/a "Zilla," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violation alleged in Count Two of this Indictment and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of said violation, including, but not limited to, a sum in United States currency representing the amount of all proceeds obtained as a result of the controlled substance offense alleged in Count Two of the Indictment.

Substitute Asset Provision

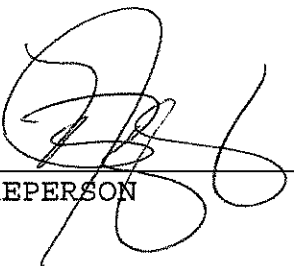
22. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

NICO BURRELL, a/k/a "Zico Nico," DOUGLAS MCLARTY, a/k/a "Q-Don," a/k/a "Q-Dizzy," MARTIN MITCHELL, a/k/a "Tyliek," DONQUE TYRELL, a/k/a "Polo Rell," GERARD BASS, a/k/a "Roddo," DOMINICK SHERLAND, a/k/a "D-Nick," BARFFOUR ABEBERSE, a/k/a "BB," a/k/a "Duce Bigga," MASHUD YODA, a/k/a "Papa Ola," ANDERSON ROSS, a/k/a "Boogy," a/k/a "Boogy Boo," a/k/a "Ray Allen Jr.," ANTHONY KING, a/k/a "Ant-Dog," MARK WILLIAMS, a/k/a "Spangler," a/k/a "Markie Bossin," QUAYSEAN CANNONIER, a/k/a "Tic-Tic," TAYQUAN TUCKER, a/k/a "Chicken," a/k/a "Chickenita," WILLIAM REID, a/k/a "Uptown Will," MARLON ROBERTS, a/k/a "Fetti," ABDULLAH YODA, a/k/a "Dellah," KENNETH RUGGS, a/k/a "Money Making Kenny," CALVIN RUGGS, a/k/a "GQ," FABIAN MORRISON, a/k/a "Fabo," SHAQUILLE DEWAR, a/k/a "Shaq Doe," DESEAN BENNETT, a/k/a "Doola," JAFAR BORDEN, a/k/a "Jaffy," JOSE RODRIGUEZ, a/k/a "Hov," SHAVON WRIGHT, a/k/a "Bhippy," a/k/a "Yung Bhippy," RASHEID BUTLER, a/k/a "Rah," BRIAN RICHARDS, a/k/a "B-Rich," DEVANTE JOSEPH, a/k/a "Wiz," STEPHAN CLARKE, JAMES PILGRIM, a/k/a "Jizzle," MICHELLE JEMISON, a/k/a "Pebbles," IVANJOEL ARYEETEEY, a/k/a "Ijoe," a/k/a "Ivan," ROBERT HAUGHTON, a/k/a "Duke," JAMAL BLAIR, a/k/a "Fish," ONEIL DASILVA, a/k/a "Soxx," a/k/a "Bobby Soxx," DURELL GUY, HAKBEM CAMPBELL, a/k/a "Ocky," a/k/a "Ackee," RICHARD PHILLIPS, a/k/a "G-Mack," RUSHAUN BROWN, a/k/a "Boobie," a/k/a "Gambino," MICHAEL FRANCIS, a/k/a "Mikey Bandz," TYRONE GRAY, a/k/a "Ty," LAMAR FRANCIS, a/k/a "Lammy," a/k/a "Andrew Blacks," SHANE BENNETT, a/k/a "Fattah," DAVID JONES, RICARDO STEWART, a/k/a "Cardo," DANTE PLUMMER, a/k/a "Tae," JOEL HARGROVE, a/k/a "Flow," SHAWN REID, a/k/a "Sama," a/k/a "Sama Lama," BRADLEY WILSON, a/k/a "Broadway," ROBERT FELICIANO, a/k/a "RJ," DANTE STEPHENS, a/k/a "Jibba," CARLETO ALLEN, a/k/a "Joker," SHAQUILLE JOHN, a/k/a "Poppy," OKEIFA JOHN, a/k/a "Ratty," DAQUAN REID, a/k/a "DQ," MICHAEL REDLEY, a/k/a "Mikey," a/k/a "Jones," ALBERT AMPONSAH, a/k/a "Jungle," RICHARD MONTAGUE, a/k/a "Spanks," ANTHONY LETTERIO, a/k/a "Yay," RAI THOMAS, a/k/a "Ritch," JAVONE PEARCE, a/k/a "Jevy," SHANICE JOHN, DOMINIQUE BASS, a/k/a "Domo," and RICARDO BURGESS, a/k/a "Zilla,"

Defendants.

SEALED SUPERSEDING INDICTMENT

S2 15 Cr. 95 (AJN)

(18 U.S.C. §§ 1962(d), 924(c)(1)(A)(iii), and 2, and 21 U.S.C. 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL

Foreperson. Deputy

4/12/16 Filed SUPERSEDING INDICTMENT. WANNAMUS ISSUED

COTY WMT